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SUBJECT: Responds to NRC 940603 ltr re deviation noted in insp rept
 50-261/94-14. Corrective actions: issue reviewed w/ individuals
 involved in change to procedure EST-023 & LER 94-008
 submitted on 940606, reporting design basis deficiency.

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JUL 15 1994

United States Nuclear Regulatory Commission
Attention: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
NRC INSPECTION REPORT NO. 50-261/94-14
NOTICE OF DEVIATION

Gentlemen:

NRC Inspection Report 50-261/94-14, which was transmitted by letter dated June 3, 1994, identified a Notice of Deviation involving the failure to include in performance test procedures, provisions for testing and test acceptance criteria that are consistent with the commitments contained in the Updated Final Safety Analysis Report. As agreed to in a telephone conversation between Mr. Paul Byron (NRC) and Mr. W. J. Dorman (CP&L) on July 1, 1994, and documented in our letter dated July 7, 1994, this reply is being submitted 15 days beyond the date originally requested.

As requested in the letter transmitting the Notice of Deviation, the enclosure restates the deviation, followed by our reply.

Should you have any questions regarding this matter, please contact Mr. K. R. Jury at (803) 383-1363.

Very truly yours,

R. M. Krich
Manager-Regulatory Affairs

RDC:lst

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP

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PDR ADDCK 05000261
Q PDR

Highway 151 and SC 23 Hartsville SC

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REPLY TO A NOTICE OF DEVIATION

Deviation 94-14-01

Sections 6.4 and 9.4.2 of the Updated Final Safety Analysis Report specified that during the emergency pressurization mode the Control Room envelope is maintained under a positive differential pressure with respect to adjacent areas and the outdoors and that periodic testing is required to demonstrate that the Control Room is pressurized to a minimum of +1/8 inches of water gage with respect to the outdoors.

Contrary to the above, the licensee's system performance testing procedures OST-750 "Control Room Emergency Ventilation System" and EST-023 "Control Room Emergency Ventilation System" failed to include provisions for testing the differential pressure between the Control Room and adjacent areas. Furthermore, both procedures indicated that the acceptance criteria for the differential pressure with respect to outdoors was greater than zero rather than a minimum of +1/8 inches of water.

1. Reason for the Deviation

This deviation was caused by failure to conduct an adequate technical review of the proposed revision to Engineering Surveillance Test (EST)-023, which was prepared as a result of the modification that installed the new control room habitability system. During the preparation of a revision to EST-023, the proposed Updated Final Safety Analysis Report (UFSAR) commitment to periodically test the +1/8 inches water gage (w.g.) pressure capability with respect to the outdoors, was not identified.

A revision to EST-023 was initiated on October 31, 1990, to incorporate the testing requirements of modification M-994, "Control Room Habitability." The modification process included confirmation via draft revisions to EST-023 that control room pressure would be verified $\geq 1/8$ inches w.g. during the emergency pressurization mode of operation. However, the procedure reviewers deleted this information from the proposed revision following comparison of the change with the proposed Technical Specifications (TS) change that was required for modification implementation, and the information included in the UFSAR at that time. The modification designers provided the UFSAR changes required for modification implementation to the site on November 20, 1990, but the changes were not published until February 19, 1992 in accordance with the annual UFSAR revision schedule.

These changes included provisions for demonstrating a positive differential pressure between the control room envelope and adjacent areas, and required testing acceptance criteria for differential pressure in the control room to be greater than + 1/8 inches w.g. with respect to the outdoors. Both of these commitments pertain during the emergency pressurization mode of control room ventilation system operation. The procedure (i.e., EST-023) reviewers did not include the proposed UFSAR commitment changes in their review.

Procedure OST-750 was originally intended to demonstrate that the requirements of TS 4.15 b. and c. were being met.

2. The Corrective Steps That Have Been Taken and the Results Achieved

This issue has been reviewed with the individuals involved in the change to procedure EST-023.

Licensee Event Report 94-008 was submitted on June 6, 1994, to report the design basis deficiency involved with this issue.

3. The Corrective Steps That Will Be Taken to Avoid Further Deviations

Procedures EST-023 and OST-750 will be revised as necessary to reflect the testing requirements and commitments as specified in the TS and the UFSAR, respectively. In addition, the information included in NRC Information Notice 86-76, "Problems Noted in Control Room Emergency Ventilation Systems," will be considered in any procedure revisions that are made.

Since the time the modification was installed and the associated implementing procedures were reviewed and approved, enhancements have been made to the Safety Reviewer program which emphasize the need to consult pending changes to the UFSAR.

4. The Date When Full Compliance Will Be Achieved

Full compliance will be achieved prior to Unit startup from Refueling Outage 16, which is scheduled to commence in April 1995.